

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DSI ASSIGNMENTS, LLC,
SOLELY AS ASSIGNEE FOR
THE BENEFIT OF CREDITORS
OF PEARL AUTOMATION INC.,
Plaintiff,

v.

AMERICAN ROAD PRODUCTS,
INC., INSTALLERNET, INC.,
ANTHONY FRANGIOSA,
STEPHEN WITT; Does 1-50,
Defendants.

Case No. 1:17-cv-11963

ASSENTED-TO MOTION TO EXTEND TIME TO FILE
OPPOSITIONS TO MOTIONS TO DISMISS
AND TO RESCHEDULE HEARING

Plaintiff DSI Assignments, LLC hereby moves for an extension of two weeks, until January 12, 2018, to file its oppositions to Defendant Stephen Witt's Motion to Dismiss for Lack of Personal Jurisdiction (Docket No. 23) and Defendants' Partial Motion to Dismiss (Docket No. 25), each filed on December 15, 2017. The current opposition deadlines are December 29, 2017. In support of this motion, Plaintiff states that its undersigned counsel will be away during Christmas week (from December 25 through January 1) and has various prior-scheduled commitments in other matters to attend to before December 22, 2017. Plaintiff's counsel will need additional time to review the various factual and legal issues raised in Defendants' motions in order to prepare Plaintiff's oppositions. The time period under which Defendants have to file any reply memoranda would, accordingly, be extended as well.

Plaintiff states that Defendants, through counsel, have assented to the request to extend the opposition and reply deadlines contained in this motion.

The parties also have consulted regarding the schedule for a hearing on Defendants' motions. The undersigned counsel are available any afternoon from February 21 through February 27, 2018 and request that the Court set the hearing on the motions for any day in that range that is convenient for the Court's schedule.

Respectfully submitted,

DSI ASSIGNMENTS, LLC, SOLELY
AS ASSIGNEE FOR THE BENEFIT
OF CREDITORS OF PEARL
AUTOMATION INC.

By its attorneys,

/s/ Michael P. Connolly

Michael P. Connolly (BBO #637642)
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ASSENTED TO:

AMERICAN ROAD PRODUCTS, INC.,
INSTALLERNET, INC., ANTHONY
FRANGIOSA, and STEPHEN WITT,

By their attorneys,

/s/ Michael F. Connolly

Michael F. Connolly (BBO #551273)
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Dated: December 18, 2017

Rule 7.1 Certificate

I, Michael P. Connolly, certify that I conferred with Michael F. Connolly, counsel for the defendants, in an attempt to resolve or narrow the issues raised by this motion. Mr. Connolly agreed to assent to the motion.

/s/ Michael P. Connolly
Michael P. Connolly

Certificate of Service

I, Michael P. Connolly, hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on December 18, 2017.

/s/ Michael P. Connolly
Michael P. Connolly